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7 Attorneys for Defendants,
NERIUM INTERNATIONAL and
8 JEFF OLSON and RENEE OLSON

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11

12 Jon Harris, an individual; on behalf of
13 himself and other persons similarly
stipulated,

14 Plaintiff,

15 vs.

16 Nerium International, LLC, a Texas Limited
Liability Company; Nerium Skincare, Inc., a
17 Texas Corporation, Jeff Olson, an individual,
Renee Olson, an individual; and DOES 1-10,
18 inclusive,

19 Defendants.
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Case No. 3:18-cv-02877-EDL

**JOINT STIPULATION TO
EXTEND DEFENDANTS' TIME
TO RESPOND TO INITIAL
COMPLAINT OF PLAINTIFF
JON HARRIS (L.R. 6-1)**

Complaint Filed: May 16, 2018
Trial Date: None

1 WHEREAS, on May 16, 2018, Plaintiff Jon Harris (“Plaintiff”) filed Case No.
2 3:18-cv-02877-EDL in the United States District Court for the Northern District of
3 California against Defendants Nerium International, LLC, Nerium Skincare, Inc., Jeff
4 Olson, and Renee Olson, on behalf of himself and other persons similarly situated (the
5 “Action”);

6 WHEREAS, Plaintiff served the Complaint in the Action on Nerium
7 International, LLC on May 22, 2018, and on individuals Jeff Olson and Renee Olson
8 on May 30, 2018;

9 WHEREAS, Plaintiff dismissed Nerium Skincare, Inc. from the Action without
10 prejudice;

11 WHEREAS, June 12, 2018 is the due date for Nerium International, LLC to
12 respond to Plaintiff’s Complaint, and June 20, 2018 is the due date for individual
13 Defendants Jeff Olson and Renee Olson to respond to Plaintiff’s Complaint;

14 WHEREAS, good cause exists for an extension to respond to the Complaint
15 because June 5, 2018 was the first time counsel for Defendants Nerium International,
16 LLC, Jeff Olson and Renee Olson were authorized to speak on behalf of said
17 Defendants in this Action;

18 WHEREAS, this is Defendants Nerium International, LLC, Jeff Olson and
19 Renee Olson’s first request to extend time to respond to the initial Complaint;

20 WHEREAS, Local Rule 6-1 permits the Parties to “stipulate in writing, without
21 a Court order to extend the time within which to answer or otherwise respond to the
22 complaint, or to enlarge or shorten the time in matters not required to be filed or
23 lodged with the Court, provided the change will not alter the date of any event or any
24 deadline already fixed by Court order” so long as such stipulation is promptly filed
25 pursuant to Civil L.R. 5;

26 WHEREAS, on June 6, 2018, the Parties, by stipulation under Local rule 6-1(a),
27 agreed to extend the response deadline to June 25, 2018 for Nerium International,
28

1 LLC, Jeff Olson and Renee Olson to answer or otherwise respond to the Complaint so
2 as to make uniform the Defendants' response deadline;

3 WHEREAS, the Parties agree that this stipulation for an extension is for
4 convenience only, and neither Plaintiff nor Defendants waive any rights, including
5 with respect to jurisdiction, venue and/or arbitration;

6 NOW, THEREFORE, by and through their respective counsel of record, the
7 Parties hereby stipulate and agree, subject to approval by the Court, that Nerium
8 International, LLC, Jeff Olson and Renee Olson's response to Plaintiff's Complaint in
9 the above-captioned action shall be due on June 25, 2018.

10
11 **IT IS SO STIPULATED.**

12
13 DATED: 6/6/18

BLANK ROME LLP

14
15 By: /s/ Laura Reathafor

16 Mike Margolis
17 Laura Reathafor
18 Brock J. Seraphin

19 Attorneys for Defendants,
NERIUM INTERNATIONAL and
JEFF OLSON and RENEE OLSON

20
21 DATED: 6/6/18

HATHAWAY, PERRETT, WEBSTER,
POWERS, CHRISMAN & GUTIERREZ, APC

22
23 By: 

24 Alejandro Gutierrez
25 Daniel J. Palay
26 Brian D. Hefelfinger

27 Attorneys for Plaintiff,
JON HARRIS

ATTESTATION REGARDING SIGNATURES

I, Laura Reathaford, attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: June 6, 2018

/s/ Laura Reathaford

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is **BLANK ROME LLP**, 2029 Century Park East, 6th Floor, Los Angeles, California 90067.

On **June 6, 2018**, I served the foregoing document(s): **JOINT STIPULATION TO EXTEND DEFENDANTS' TIME TO RESPOND TO INITIAL COMPLAINT OF PLAINTIFF JON HARRIS (L.R. 6-1)** on the interested parties in this action addressed and sent as follows:

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- ☐ **BY ENVELOPE:** by placing ☐ the original ☐ a true copy thereof enclosed in sealed envelope(s) addressed as indicated and delivering such envelope(s):
- ☐ **BY MAIL:** I caused such envelope(s) to be deposited in the mail at Los Angeles, California with postage thereon fully prepaid to the office or home of the addressee(s) as indicated. I am "readily familiar" with this firm's practice of collection and processing documents for mailing. It is deposited with the U.S. Postal Service on that same day, with postage fully prepaid, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☒ **BY ELECTRONIC FILING:** I am familiar with the United States District Court, Northern District of California's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the court. The court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document. Registration as a CM/ECF user constitutes consent to electronic service through the court's transmission facilities. Under said practice, the CM/ECF users above were served.
- ☒ **FEDERAL:** I declare that I am employed in the office of a member of the bar of this court at whose direction service was made.

Executed on **June 6, 2018**, at Los Angeles, California.


Michelle Grams